

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Kevin W. Brinze : Ch. 13  
Donna L. Brinze :  
 :  
Debtors : 19-11434 mdc

**RESPONSE TO MOTION OF DEUTSCHE BANK NATIONAL TRUST COMPANY FOR RELIEF  
FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362(d) WITH RESPECT TO PROPERTY:  
205 HYACINTH COURT, QUAKERTOWN, PA 18951**

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied
7. Denied
8. Denied.
9. Denied.
10. Denied.
11. Denied.

WHEREFORE, Debtor requests this Honorable Court enter an Order denying the Motion of Deutsche Bank National Trust Company for Relief from the Automatic Stay under 11 U.S.C. 362 (d) Pursuant to Bankruptcy Procedure Rule 4001.

Respectfully submitted,

Dated: July 1, 2020

/s/ Paul Gregory Lang, Esquire  
Paul Gregory Lang, Esquire  
Parlow & Lang, PCs  
3618 Hulmeville Rd.  
Bensalem, PA 19020  
Phone: 215-639-4400  
Email: paulgregorylang@yahoo.com

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**CERTIFICATE OF SERVICE**

I, Paul Gregory Lang Esq., attorney for the above-names debtors do hereby certify that I have caused to be served on this date, by First Class Mail or ECF filing, a true and correct copy of the Debtor's Response to Motion of Deutsche Bank National Trust Company for Relief from the Automatic Stay under 11 U.S.C. 362 (d) with respect to Property: 205 Hyacinth Court, Quakertown, PA 18951 upon the following:

Office of the U.S. Trustee  
833 Chestnut Street  
Philadelphia, PA 19107

Kevin and Donna Brinze  
205 Hyacinth Court  
Quakertown, PA 18951

William C. Miller  
Chapter 13 Trustee  
P.O. Box 1229  
Philadelphia, PA 19105

Brian C. Nicholas, Esq  
Attorney for Deutsche Bank National Trust Company  
KML Law Group, PC  
BNY Mellon Independence Center  
701 Market Street Suite 5000  
Philadelphia, PA 19106

Dated: July 1, 2020

/s/ Paul Gregory Lang, Esquire  
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3618 Hulmeville Rd  
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